

BEFORE THE DIVISION OF MEDICAL QUALITY
BOARD OF MEDICAL QUALITY ASSURANCE
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA


In the Matter of the Accusation)
Against:)
)
WILLIAM R. HILDEBRAND, M.D.) No. D-3099
Certificate No. A-28826)
)
Respondent)
_____)

DECISION

The attached Stipulation is hereby adopted by the Division of Medical Quality of the Board of Medical Quality Assurance as its Decision in the above-entitled matter.

This Decision shall become effective on February 6, 1984.
IT IS SO ORDERED January 5, 1984.

DIVISION OF MEDICAL QUALITY
BOARD OF MEDICAL QUALITY ASSURANCE



MILLER MEDEARIS
Secretary-Treasurer

1 JOHN K. VAN DE KAMP, Attorney General
2 of the State of California
3 JOEL S. PRIMES
4 Deputy Attorney General
5 1515 K Street, Suite 511
6 Sacramento, California 95814
7 Telephone: (916) 324-5340
8 Attorneys for Complainant

9 BEFORE
10 DIVISION OF MEDICAL QUALITY
11 BOARD OF MEDICAL QUALITY ASSURANCE
12 DEPARTMENT OF CONSUMER AFFAIRS
13 STATE OF CALIFORNIA

14 In the Matter of the Accusation) No. D-3099
15 Against:)
16)
17 WILLIAM R. HILDEBRAND, M.D.) STIPULATION
18 107 South Roop Street) AND ORDER
19 Susanville, CA 96130)
20 Respondent.)
21)
22)

23 Respondent, William R. Hildebrand, M.D., and the Board
24 of Medical Quality Assurance, Division of Medical Quality, through
25 its counsel Deputy Attorney General Joel S. Primes, do hereby
26 enter into the following stipulation:

27 1. Respondent, William R. Hildebrand, M.D., hereby
acknowledges receipt of Accusation No. D-3099, Statement to Re-
spondent and copies of the Notice of Defense form.

2. Respondent is aware of all of the charges and alle-
gations contained in said Accusation No. D-3099 on file with the
Division of Medical Quality, Board of Medical Quality Assurance.

3. Respondent is fully aware of his right to a hearing
on the charges and allegations contained in said Accusation No. D-

3099, his right to reconsideration, appeal and any and all other rights which may be accorded pursuant to the California Administrative Procedure Act and the laws of the State of California.

4. Respondent hereby freely and voluntarily waives his right to a hearing, reconsideration, appeal and any and all other rights which may be accorded by the California Administrative Procedure Act and the laws of the State of California with regard to said Accusation No. D-3099.

5. For the purposes of this proceeding, respondent admits each and every allegation contained in Accusation No. D-3099. Based on the foregoing stipulation, the Division of Medical Quality, Board of Medical Quality Assurance, may issue the following order:

A. The license to practice medicine and surgery in the State of California heretofore issued to respondent is revoked; provided, however, execution of this order of revocation shall be stayed and respondent shall be placed on probation for a period of five years from and after the effective date of this decision upon the terms and conditions listed herein:

1. CONTROLLED DRUGS - PARTIAL RESTRICTION. Respondent shall not prescribe, administer, dispense, order, or possess any controlled substances as defined by the California Uniform Controlled Substances Act, except for those drugs listed in Schedules I, III, IV, and V of the act.

2. DRUGS - EXCEPTION FOR PERSONAL ILLNESS. Orders forbidding respondent from personal use or possession of controlled substances or dangerous drugs do not apply to medications

1 lawfully prescribed to respondent for a bona fide illness or
2 condition by another practitioner.

3 3. EDUCATION COURSE. Within 90 days of the effective
4 date of this decision, and on an annual basis thereafter, respon-
5 dent shall submit to the Division for its prior approval an edu-
6 cational program or course related to family practice, which
7 shall not be less than 40 hours per year, for each year of pro-
8 bation. This program shall be in addition to the Continuing
9 Medical Education requirements for relicensure. Following the
10 completion of each course, the Division or its designee may ad-
11 minister an examination to test respondent's knowledge of the
12 course.

13 4. ORAL CLINICAL EXAMINATION. Within 60 days of the
14 effective date of this decision, respondent shall take and pass
15 an oral clinical examination in family practice to be adminis-
16 tered by the Division or its designee. If respondent fails this
17 examination, respondent must wait three months between reexami-
18 nations, except that after three failures respondent must wait
19 one year to take each necessary reexamination thereafter. The
20 Division shall pay the cost of the first examination and respon-
21 dent shall pay the costs of any subsequent examinations. Respon-
22 dent shall not practice medicine in California until respondent
23 has passed this examination and has been so notified by the Di-
24 vision in writing.

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1 5. OBEY ALL LAWS. Respondent shall obey all federal,
2 state, and local laws and all rules governing the practice of
3 medicine in California.

4 6. QUARTERLY REPORTS. Respondent shall submit quart-
5 erly declarations under penalty of perjury on forms provided by
6 the Division, stating whether there has been compliance with all
7 the conditions of probation.

8 7. SURVEILLANCE PROGRAM. Respondent shall comply
9 with the Division's probation surveillance program.

10 8. INTERVIEW WITH MEDICAL CONSULTANT. Respondent
11 shall appear in person for interviews with the Division's medi-
12 cal consultant upon request at various intervals and with rea-
13 sonable notice.

14 9. TOLLING FOR OUT-OF-STATE PRACTICE OR RESIDENCE. In
15 the event respondent should leave California to reside or to
16 practice outside the State, respondent must notify in writing
17 the Division of the dates of departure and return. Periods of
18 residency or practice outside California will not apply to the
19 reduction of this probationary period.

20 10. VIOLATION OF PROBATION. If respondent violates
21 probation in any respect, the Division, after giving respondent
22 notice and the opportunity to be heard, may revoke probation and
23 carry out the disciplinary order that was stayed. If an accu-
24 sation or petition to revoke probation is filed against respon-
25 dent during probation, the Division shall have continuing juris-
26 diction until the matter is final, and the period of probation
27 shall be extended until the matter is final.

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11. COMPLETION OF PROBATION. Upon successful completion of probation, respondent's certificate will be fully restored.

It is agreed that the terms set forth herein shall be null and void and not binding upon the parties hereto unless approved by the Board of Medical Quality Assurance of the State of California.

DATED: *Nov. 21, 1983*

JOHN K. VAN DE KAMP, Attorney General
of the State of California
JOEL S. PRIMES
Deputy Attorney General

By *Joel S. Primes*
JOEL S. PRIMES
Deputy Attorney General

Attorneys for Complainant

I have read the above document and agree to the above stipulation and disciplinary order.

DATED: *William R. Hildebrand*
WILLIAM R. HILDEBRAND, M.D.
Respondent

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of the State of California

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9 DIVISION OF MEDICAL QUALITY
10 BOARD OF MEDICAL QUALITY ASSURANCE
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

11 In the Matter of the Accusation) No. D-3099
12 Against:)
13 WILLIAM R. HILDEBRAND, M.D.) ACCUSATION
14 107 South Roop Street)
Susanville, CA 96130)
15 License No. A-28826)
16 Respondent.)

17 COMES NOW the complainant, Stephen Wilford, and as
18 cause for disciplinary action against the above respondent, al-
19 leges as follows:

20 I

21 Complainant, Stephen Wilford, is the Acting Executive
22 Director of the Board of Medical Quality of the State of Cali-
23 fornia (hereinafter referred to as "Board") and makes this accu-
24 sation solely in such official capacity and not otherwise.

25 II

26 Respondent, William R. Hildebrand, M.D., on or about
27 March 21, 1975, was issued physician and surgeon certificate

1 number A-28826 by the Board to practice medicine and surgery in
2 the State of California, and at all times mentioned herein respon-
3 dent was licensed by the Board to practice medicine and surgery
4 in this State. On August 24, 1961, respondent was issued osteo-
5 pathic physician and surgeon certificate number 20A-2809 under
6 the jurisdiction of the Board of Osteopathic Examiners. In 1962,
7 respondent elected to use the designation "M.D." rather than
8 "D.O." and came under the jurisdiction of the Board.

9 III

10 Business and Professions Code section 2234 (formerly §
11 2361) provides that the Division of Medical Quality shall take
12 action against any licensee who is charged with unprofessional
13 conduct. In addition to other provisions of this article, un-
14 professional conduct includes, but is not limited to, the fol-
15 lowing:

- 16 (b) Gross negligence.
- 17 (c) Repeated similar negligent acts.
- 18 (d) Incompetence.

19 IV

20 Business and Professions Code section 725 provides that
21 the repeated acts of clearly excessive prescribing or adminis-
22 tering of drugs or treatment, repeated acts of clearly excessive
23 use of diagnostic procedures, or repeated acts of clearly ex-
24 cessive use of diagnostic or treatment facilities as determined
25 by the standard of the local community of licensees is unpro-
26 fessional conduct for a physician and surgeon, dentist, podi-
27 atrist, psychologist, physical therapist, chiropractor, or optom-
28 etrist.

1 Any person who engages in repeated acts of clearly
2 excessive prescribing or administering of drugs or treatment is
3 guilty of a misdemeanor and shall be punished by a fine of not
4 less than one hundred dollars (\$100) nor more than six hundred
5 dollars (\$600) or by imprisonment for a term of not less than 60
6 days nor more than 180 days or by both such fine and imprison-
7 ment.

8 V

9 Business and Professions Code section 2242 provides
10 that:

11 (a) Prescribing, dispensing, or furnishing dangerous
12 drugs as defined in section 4211 without a good faith prior exam-
13 ination and medical indication therefor, constitutes unpro-
14 fessional conduct.

15 (b) No licensee shall be found to have committed un-
16 professional conduct within the meaning of this section if, at
17 the time the drugs were prescribed, dispensed, or furnished, any
18 of the following applies:

19 (1) The licensee was a designated physician and surgeon
20 or podiatrist serving in the absence of the patient's physician
21 and surgeon or podiatrist, as the case may be, provided such
22 drugs were prescribed, dispensed, or furnished only as necessary
23 to maintain the patient until the return of his or her practi-
24 tioner, but in any case no longer than 72 hours.

25 (2) The licensee transmitted the order for such drugs
26 to a registered nurse or to a licensed vocational nurse in an
27 inpatient facility (A) if such practitioner had consulted with

1 such registered nurse or licensed vocational nurse who had re-
2 viewed the patient's records and (B) if such practitioner was
3 designated as the practitioner to serve in the absence of the
4 patient's physician and surgeon or podiatrist, as the case may
5 be.

6 (3) The licensee was a designated practitioner serving
7 in the absence of the patient's physician and surgeon or podi-
8 atrist, as the case may be, and was in possession of or had uti-
9 lized the patient's records and ordered the renewal of a medi-
10 cally indicated prescription for an amount not exceeding the
11 original prescription in strength or amount or for more than one
12 refilling.

13 VI

14 Health and Safety Code section 11154 provides:

15 Except in the regular practice of his profession, no
16 person shall prescribe, administer, dispense, or furnish, a con-
17 trolled substance to or for any person who is not under his treat-
18 ment for a pathology or condition other than addiction to a con-
19 trolled substance, except as provided in this division.

20 (a) Except in the regular practice of his or her pro-
21 fession, no person shall knowingly prescribe, administer, dis-
22 pense, or furnish a controlled substance to or for any person or
23 animal which is not under his or her treatment for a pathology or
24 condition other than addiction to a controlled substance, except
25 as provided in this division.

26 (b) No person shall knowingly solicit, direct, induce,
27 aid, or encourage a practitioner authorized to write a pre-

1 scription to unlawfully prescribe, administer, dispense, or fur-
2 nish a controlled substance.

3 VII

4 Respondent, William R. Hildebrand, M.D., is guilty of
5 unprofessional conduct under the provisions of Business and Pro-
6 fessions Code sections 725, excessive prescribing, 2234, sub-
7 division (b), gross negligence, subdivision (c), repeated similar
8 negligent acts, subdivision (d), incompetence, 2242, prescribing
9 without good faith prior examination and medical indication and
10 Health and Safety Code section 11154, prescribing without medical
11 indication as is more specifically set forth below:

12 COUNT I

13 Patient Judy V.

14 Respondent in a grossly negligent and incompetent manner
15 excessively and inappropriately prescribed the drugs listed below
16 to patient Judy V.

17 A. Gross Negligence

18 Respondent failed to perform an adequate history, phys-
19 ical examination, and order appropriate laboratory studies for
20 patient Judy V. on her initial visit on April 14, 1981.

21 B. Excessive Prescribing

22 Respondent excessively prescribed the following drugs
23 to patient Judy V.

24 <u>Date</u>	<u>Drug</u>	<u>Quantity</u>	<u>Strength</u>
25 4/14/81	Preludin	30	75 mg.
26 5/11/81	"	30	75 mg.
27 6/1/81	"	30	75 mg.

1	6/25/81	"	30	75 mg.
2	8/17/81	"	30	75 mg.
3	9/15/81	Desoxyn	30	15 mg.

4 C. Inappropriate Prescribing

5 Respondent prescribed the following drugs without a
6 medical condition or pathology indicating a need for the medi-
7 cation as follows:

8	<u>Drug</u>	<u>Date</u>
9	Lasix	6/25/81
10	"	7/1/82
11	"	10/4/82
12	Lomotil	6/25/81

13 COUNT II

14 Patient Barbara B.

15 Respondent in a grossly negligent and incompetent man-
16 ner excessively and inappropriately prescribed the drugs listed
17 below to patient Barbara B.

18 A. Gross Negligence

19 Respondent failed to perform an adequate history, phys-
20 ical examination, and order appropriate laboratory studies for
21 patient Barbara B. on her initial visit on August 8, 1976.

22 B. Excessive Prescribing

23 Respondent excessively prescribed the following drugs
24 to patient Barbara B.

25	<u>Date</u>	<u>Drug</u>	<u>Quantity</u>	<u>Strength</u>
26	2/24/81	Biphetamine	30	20 mg.
27	4/1/81	"	30	20 mg.

1	5/7/81	Biphetamine	30	20 mg.
2	6/18/81	Eskatrol	30	
3	7/15/81	Biphetamine	30	20 mg.
4	8/13/81	"	30	20 mg.
5	9/16/81	"	30	20 mg.
6	11/18/81	Desoxyn	30	15 mg.

7 C. Inappropriate Prescribing

8 Respondent prescribed the following drugs without a
9 medical condition or pathology indicating a need for the medi-
10 cation to patient Barbara B. as follows:

<u>Drug</u>	<u>Date</u>
Diuril	5/25/77
Synthroid .1 mg.	6/8/76
" .2 mg.	7/15/81
Lasix	7/15/81

16 COUNT III

17 Patient Carrol M.

18 Respondent in a grossly negligent and incompetent man-
19 ner excessively and inappropriately prescribed the drugs listed
20 below to patient Carrol M.

21 A. Gross Negligence

22 Respondent failed to perform an adequate history, phys-
23 ical examination, and order appropriate laboratory studies for
24 patient Carrol M. on her initial visit on September 23, 1980.

25 B. Excessive Prescribing

26 Respondent excessively prescribed the following drugs
27 to patient Carrol M.

<u>Date</u>	<u>Drug</u>	<u>Quantity</u>	<u>Strength</u>
1/11/81	Desoxyn	30	15 mg.
2/18/81	"	30	15 mg.
3/16/81	"	30	15 mg.

C. Inappropriate Prescribing

Respondent prescribed the following drug without a medical condition or pathology indicating a need for the medication as follows:

<u>Drug</u>	<u>Date</u>
Synthroid .2 mg.	9/23/80

COUNT IV

Patient Douglas M.

Respondent in a grossly negligent and incompetent manner prescribed the drugs listed below to patient Douglas M.

A. Gross Negligence

Respondent failed to perform an adequate history, physical examination, and order appropriate laboratory studies for patient Douglas M. on his initial visit on September 23, 1980.

B. Excessive Prescribing

Respondent excessively prescribed the following drugs to patient Douglas M.

<u>Date</u>	<u>Drug</u>	<u>Quantity</u>	<u>Strength</u>
1/19/81	Biphetamine	30	20 mg.
2/18/81	"	30	20 mg.
3/16/81	"	30	20 mg.

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COUNT V

Patient Naomi Y.

Respondent in a grossly negligent and incompetent manner excessively and inappropriately prescribed the drugs listed below to patient Naomi Y.

A. Gross Negligence

Respondent failed to perform an adequate history, physical examination, and order appropriate laboratory studies for patient Naomi Y. on her initial visit on May 14, 1979.

B. Excessive Prescribing

Respondent excessively prescribed the following drugs to patient Naomi Y.

<u>Date</u>	<u>Drug</u>	<u>Quantity</u>	<u>Strength</u>
2/21/81	Eskatrol	30	
3/10/81	"	30	
4/30/81	"	30	
4/16/81	Preludin	30	75 mg.
7/16/81	"	30	75 mg.
8/10/81	Biphetamine	30	20 mg.
8/27/81	Desoxyn	30	15 mg.
9/10/81	"	30	15 mg.
11/17/81	Preludin	30	75 mg.

C. Inappropriate Prescribing

Respondent prescribed the following drugs to patient Naomi Y. without a medical condition or pathology indicating a need for the medication as follows:

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1 Drug Date
2 Synthroid 4/16/81
3 " 7/16/81

4 COUNT VI

5 Patient Cindy W.

6 Respondent in a grossly negligent and incompetent man-
7 ner excessively and inappropriately prescribed the drugs listed
8 below to patient Cindy W.

9 A. Gross Negligence

10 Respondent failed to perform an adequate history, phys-
11 ical examination, and order appropriate laboratory studies for
12 patient Cindy W. on her initial visit on January 21, 1981.

13 B. Excessive Prescribing

14 Respondent excessively prescribed the following drugs
15 to patient Cindy W.

<u>Date</u>	<u>Drug</u>	<u>Quantity</u>	<u>Strength</u>
1/22/81	Preludin	30	75 mg.
2/19/81	"	30	75 mg.
4/16/81	Biphetamine	30	20 mg.
6/30/81	Preludin	30	75 mg.
7/28/81	"	30	75 mg.
8/24/81	"	30	75 mg.
9/28/81	"	30	75 mg.
11/16/81	Desoxyn	30	15 mg.

25 C. Inappropriate Prescribing

26 Respondent prescribed the following drugs to patient

27 ///

1 Cindy W. without a medical condition or pathology indicating a
2 need for the medication as follows:

<u>Drug</u>	<u>Date</u>
Synthroid .1 mg.	1/21/81
"	6/30/81
"	9/28/81

7 COUNT VII

8 Patient Nancy B.

9 Respondent in a grossly negligent and incompetent man-
10 ner excessively and inappropriately prescribed the drugs listed
11 below to patient Nancy B.

12 A. Gross Negligence

13 Respondent failed to perform an adequate history, phys-
14 ical examination, and order appropriate laboratory studies for
15 patient Nancy B. on her initial visit on May 30, 1978.

16 B. Excessive Prescribing

17 Respondent excessively prescribed the following drugs
18 to patient Nancy B.

<u>Date</u>	<u>Drug</u>	<u>Quantity</u>	<u>Strength</u>
2/9/81	Desoxyn	30	10 mg.
3/5/81	"	30	15 mg.
4/6/81	"	30	15 mg.
5/6/81	Eskatrol	30	
5/10/81	Desoxyn	30	15 mg.
6/4/81	Biphetamine	30	20 mg.
7/22/81	"	30	20 mg.

27 ///

1 C. Inappropriate Prescribing

2 Respondent prescribed the following drugs to patient
3 Nancy B. without a medical condition or pathology indicating a
4 need for the medication as follows:

5 <u>Drug</u>	6 <u>Date</u>
7 Desoxyn 15 mg.	5/10/81
8 Synthroid .1 mg.	5/2/80
9 Synthroid .1 mg.	11/11/81
10 Synthroid .1 mg.	6/8/82
11 Lasix	7/21/80
12 Lasix	2/23/82
13 Lasix	6/8/82

14 COUNT VIII

15 Patient Juanita C.

16 Respondent in a grossly negligent and incompetent man-
17 ner excessively and inappropriately prescribed the drugs listed
18 below to patient Juanita C.

19 A. Gross Negligence

20 Respondent failed to perform an adequate history, phys-
21 ical examination, and order appropriate laboratory studies for
22 patient Juanita C. on her initial visit on April 9, 1981.

23 B. Excessive Prescribing

24 Respondent excessively prescribed the following drugs
25 to patient Juanita C.

26 <u>Date</u>	27 <u>Drug</u>	<u>Quantity</u>	<u>Strength</u>
4/9/81	Preludin	30	75 mg.
5/7/81	"	30	75 mg.

1	6/4/81	Preludin	30	75 mg.
2	7/7/81	"	30	75 mg.
3	8/4/81	"	30	75 mg.

4 C. Inappropriate Prescribing

5 Respondent prescribed the following drug to patient
 6 Juanita C. without a medical condition or pathology indicating a
 7 need for the medication as follows:

8	<u>Drug</u>	<u>Date</u>
9	Synthroid	8/4/81

10 COUNT IX

11 Patient Barbara B.

12 Respondent in a grossly negligent and incompetent man-
 13 ner excessively and inappropriately prescribed the drugs listed
 14 below to patient Barbara B.

15 A. Gross Negligence

16 Respondent failed to perform an adequate history, phys-
 17 ical examination, and order appropriate laboratory studies for
 18 patient Barbara B. on her initial visit on November 12, 1981.

19 B. Excessive Prescribing

20 Respondent excessively prescribed the following drugs
 21 to patient Barbara B.

22	<u>Date</u>	<u>Drug</u>	<u>Quantity</u>	<u>Strength</u>
23	1/28/81	Desoxyn	30	15 mg.
24	3/2/81	"	30	15 mg.
25	4/9/81	Biphetamine	30	20 mg.
26	6/8/81	Desoxyn	30	15 mg.
27	7/13/81	"	30	15 mg.
28	11/12/81	"	30	15 mg.

COUNT X-

Patient Cheryl R.

Respondent in a grossly negligent and incompetent manner excessively and inappropriately prescribed the drugs listed below to patient Cheryl R.

A. Gross Negligence

Respondent failed to perform an adequate history, physical examination, and order appropriate laboratory studies for patient Cheryl R. on her initial visit on November 27, 1978.

B. Excessive Prescribing

Respondent excessively prescribed the following drugs to patient Cheryl R.

<u>Date</u>	<u>Drug</u>	<u>Quantity</u>	<u>Strength</u>
4/8/81	Preludin	30	75 mg.
5/6/81	"	30	75 mg.
6/3/81	Desoxyn	30	15 mg.
7/1/81	"	30	15 mg.
7/24/81	Biphetamine	30	20 mg.
8/26/81	"	30	20 mg.

C. Inappropriate Prescribing

Respondent prescribed the following drug to patient Cheryl R. without a medical condition or pathology indicating a need for the medication as follows:

<u>Drug</u>	<u>Date</u>
Preludin 75 mg.	4/8/81

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COUNT XI

Patient Tina Louise S.

Respondent in a grossly negligent and incompetent manner excessively and inappropriately prescribed the drugs listed below to patient Tina Louise S.

A. Gross Negligence

Respondent failed to perform an adequate history, physical examination, and order appropriate laboratory studies for patient Tina Louise S. on her initial visit on June 2, 1981.

B. Excessive Prescribing

Respondent excessively prescribed the following drugs to patient Tina Louise S.

<u>Date</u>	<u>Drug</u>	<u>Quantity</u>	<u>Strength</u>
6/2/81	Desoxyn	30	15 mg.
7/7/81	"	30	15 mg.
8/4/81	Preludin	30	75 mg.
10/1/81	"	30	75 mg.
11/23/81	"	30	75 mg.
9/1/81	"	30	75 mg.

C. Inappropriate Prescribing

Respondent prescribed the following drugs to patient Tina Louise S. without a medical condition or pathology indicating a need for the medication as follows:

<u>Drug</u>	<u>Date</u>
Desoxyn	6/2/81
Synthroid	8/4/81
Synthroid	10/1/81

COUNT XII

Patient Thelma H.

Respondent in a grossly negligent and incompetent manner excessively and inappropriately prescribed the drugs listed below to patient Thelma H.

A. Gross Negligence

Respondent failed to perform an adequate history, physical examination, and order appropriate laboratory studies for patient Thelma H. on her initial visit on April 15, 1981.

B. Excessive Prescribing

Respondent excessively prescribed the following drugs to patient Thelma H.

<u>Date</u>	<u>Drug</u>	<u>Quantity</u>	<u>Strength</u>
4/15/81	Preludin	30	75 mg.
5/13/81	"	30	75 mg.
6/10/81	"	30	75 mg.
7/9/81	Desoxyn	30	15 mg.
8/6/81	"	30	15 mg.

C. Inappropriate Prescribing

Respondent prescribed the following drugs to patient Thelma H. without a medical condition or pathology indicating a need for the medication as follows:

<u>Drug</u>	<u>Date</u>
Preludin	4/15/81
"	5/13/81
"	6/10/81
Desoxyn	7/9/81
"	8/6/81

COUNT XIII

Patient JoAnn P.

Respondent in a grossly negligent and incompetent manner excessively and inappropriately prescribed the drugs listed below to patient JoAnn P.

A. Gross Negligence

Respondent failed to perform an adequate history, physical examination, and order appropriate laboratory studies for patient JoAnn P. on her initial visit on April 1, 1981.

B. Excessive Prescribing

Respondent excessively prescribed the following drugs to patient JoAnn P.

<u>Date</u>	<u>Drug</u>	<u>Quantity</u>	<u>Strength</u>
4/1/81	Preludin	30	75 mg.
4/29/81	Eskatrol	30	
5/26/81	"	30	
6/22/81	"	30	
7/20/81	Desoxyn	30	15 mg.
8/17/81	"	30	15 mg.

COUNT XIV

Patient Kim B.

Respondent in a grossly negligent and incompetent manner excessively and inappropriately prescribed the drugs listed below to patient Kim B.

A. Gross Negligence

Respondent failed to perform an adequate history, physical examination, and order appropriate laboratory studies for

1 patient Kim B. on her initial visit on April 21, 1982. Respon-
2 dent prescribed Preludin, 75 mg., on April 21 1982 and May 25,
3 1982, to this patient who asked for the drug by name and said she
4 wanted it to give her a boost.

5 B. Excessive Prescribing

6 Respondent excessively prescribed the following drugs
7 to patient Kim B.

8 <u>Drug</u>	<u>Date</u>
9 Preludin	4/21/82
10 Preludin	5/25/82

11 C. Inappropriate Prescribing

12 Respondent prescribed the following drugs to patient
13 Kim B. without a medical condition or pathology indicating a need
14 for the medication as follows:

15 <u>Drug</u>	<u>Date</u>
16 Preludin 75 mg.	4/21/82
17 Preludin 75 mg.	5/25/82

18 WHEREFORE, complainant prays that the Division of Medi-
19 cal Quality, Board of Medical Quality Assurance, State of Cali-
20 fornia, hold a hearing, and upon proof of any or all charges
21 contained herein take disciplinary action and separately and
22 severally revoke or suspend the certificate heretofore issued to
23 respondent, William R. Hildebrand, M.D., to practice medicine and
24 surgery in the State of California and for such other and further
25 action as the Board deems proper.

26 DATED: September 1, 1983

Anthony Gallo MD For
STEPHEN WILFORD
Acting Executive Director
Board of Medical Quality Assurance